

AUSA Michael C. Martin
Special Agent Shaun J. Kahanec

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UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

SYED IBRAHIM HUSSAIN for

Case: 2:13-mj-30276
 Judge: Unassigned,
 Filed: 05-03-2013 At 02:00 PM
 SEALED MATTER (LCB)

CRIMINAL COMPLAINT

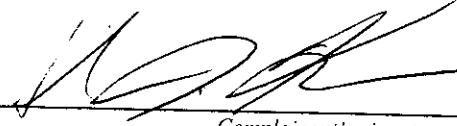
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2012 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Section 875(c)	Threats using interstate communication

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Shaun J. Kahanec, Special Agent

Printed name and title



Judge's signature

Mona K. Majzoub, United States Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

Date: May 3, 2013

City and state: Detroit, Michigan

EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION
DETROIT, MICHIGAN

AFFIDAVIT

I, Shaun J. Kahanec, being duly sworn, depose and state that:

1. I am a special agent with the Federal Bureau of Investigation (FBI) and have been so employed for the last 58 months. I am presently assigned to the FBI Detroit Joint Terrorism Task Force (JTTF) to work a variety of national security and criminal matters. Upon joining the FBI, I received five months of training in law enforcement investigative techniques, including the investigation of national security and other criminal matters, and investigative techniques related to the search of computers, and other electronic devices. Prior to becoming a Special Agent, I received a Bachelor of Science degree in Finance from Western Michigan University after which I worked as a Financial Advisor for over six years.
2. The information contained in this affidavit is a combination of this affiant's personal knowledge of this investigation, information obtained from duly sworn law enforcement officers or agents, FBI records, and information obtained from third-party witnesses.
3. The information contained in this affidavit is submitted for the purpose of demonstrating probable cause to obtain a criminal complaint charging SYED IBRAHIM HUSSAIN for making threats via interstate communications in violation of 18 U.S.C. Section 875(c). This affidavit is also submitted in support of an arrest warrant.
4. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause for a criminal complaint and arrest warrant, it does not contain all the information known to me and/or other law enforcement officers involved in this case.

5. According to information from the Dearborn Police Department, on 03/05/13, a female resident of Dearborn, Michigan, hereafter referred to as VICTIM 1, filed a report with the Dearborn Police stating that between 12/24/12 and 01/30/13, she had been contacted numerous times by a SYED IBRAHIM HUSSAIN. VICTIM 1 stated that HUSSAIN would routinely communicate with her via "Facebook" and he threatened to tell VICTIM 1's father about their "relationship" if she did not agree to marry him. VICTIM 1 advised that HUSSAIN had made reference to raping and killing her in text messages and emails. VICTIM 1 advised that she had asked HUSSAIN to leave her alone on several occasions which he disregarded. VICTIM 1 stated that she wished HUSSAIN to refrain from contacting her.
6. On 04/24/2013, Canadian Border Services Agency (CBSA) notified Detroit FBI that SYED IBRAHIM HUSSAIN was subject to a secondary border entry inspection during his attempted entry into Canada via the Ambassador Bridge. HUSSAIN initially stated he was traveling to Windsor, Ontario, to go shopping on his time off from medical school rotations. He then told the CBSA he was traveling to Windsor, Ontario, to consult with a doctor; however, HUSSAIN could not recall the name of the doctor. HUSSAIN's vehicle and belongings were searched and he was interviewed by the CBSA pursuant to the secondary border inspection. Numerous messages were found on HUSSAIN's iPhone during the inspection encouraging him to stay on a "mission." The messages also indicated HUSSAIN had finished "phase C" on 04/24/2013 and was transitioning to "phase D." One of the messages read, "in the chance this mission succeeds, I might make a good solider after all." (sic) Canadian Agents found buckshot shotgun ammunition

during the search of HUSSAIN's vehicle. Photos of a shotgun, pistol, and a taser, were found on HUSSAIN's iPhone.

7. Canadian Border Agents, during their search of HUSSAIN's iPhone on 04/24/2013, discovered information that indicated HUSSAIN purchased several items in the recent weeks, to include Spygadget.com Global Positioning System (GPS) vehicle and person trackers, a monthly subscription to Brickhouse Security (according to its website, Brickhouse Security specializes in selling surveillance and tracking equipment and services), and a new cell phone from cellphonesshop.net. HUSSAIN purchased numerous GPS signal jamming devices and other equipment from Spygadget.com. There was information in HUSSAIN's email account that indicated he hired a private detective agency in Merriville, Indiana to gather information regarding VICTIM 1 on HUSSAIN's behalf.
8. Canadian Border Agents, during their search of HUSSAIN's iPhone on 04/24/2013, discovered HUSSAIN had a text message conversation with an individual who mentioned that she knew about two tracking devices HUSSAIN placed on cars and she wanted to know if anyone was going to get hurt. HUSSAIN replied hopefully not, and then discussed the "phases of mission." HUSSAIN stated he will have "phase D and E" if he were attacked and "phase C" would start on 04/24/2013 while "phase B" ended.
9. During the search of HUSSAIN's iPhone, Canadian Border Agents discovered HUSSAIN was in contact with a second individual. This second individual encouraged HUSSAIN to continue his mission. Other references to the rape of women were discovered on HUSSAIN's iPhone.

10. On 04/24/2013, VICTIM 1 was interviewed at her residence by law enforcement officers with the FBI JTTF. According to VICTIM 1, she met HUSSAIN on Facebook, on or about November 2012. At that time, VICTIM 1 provided HUSSAIN her cellular telephone number, and HUSSAIN provided VICTIM 1 his telephone number XXX-XXX-2597. Almost immediately after VICTIM 1 and HUSSAIN began communicating, HUSSAIN made it clear that he wanted to marry VICTIM 1, but VICTIM 1 said no to these requests from the beginning. VICTIM 1 agreed to meet HUSSAIN in person, to give him a chance as a friend. VICTIM 1 met with HUSSAIN twice in public places, once at an Islamic Center and once at a library. These meetings occurred in November and December 2012.
11. VICTIM 1 further stated that from their conversations in November and December 2012, VICTIM 1 learned that HUSSAIN lived in Florida and was staying at an extended stay hotel in Dearborn, Michigan. HUSSAIN insisted that he wanted to marry VICTIM 1 so badly because he was Pakistani, divorced with two kids, and believed that VICTIM 1 was a woman who was acceptable for HUSSAIN to marry.
12. HUSSAIN sent VICTIM 1 text messages where HUSSAIN threatened to gang rape VICTIM, and HUSSAIN stated that his mother was Puerto Rican and that he had connections to gangs in Florida which VICTIMS 1 took seriously and believed were a physical threat to her.
13. During the interview of VICTIM 1, law enforcement officers identified a black plastic box, magnetically attached to the underside of VICTIM 1's blue Chevrolet Malibu, near the rear passenger door. VICTIM 1 authorized Agents to remove the box from her

vehicle and let the Agents take custody of the box. Upon inspection, the box appeared to be a tracking device and had serial number 7019781 printed on it.

14. Records from the company US Fleet Tracking indicate that HUSSAIN purchased four GPS tracking devices from US Fleet Tracking, one of which had serial number 7019781.

According to its internet website, US Fleet Tracking “is a GPS tracking manufacturer providing Internet-based access to LIVE vehicle tracking.”

15. VICTIM 1 provided law enforcement officers copies of text messages sent to her by HUSSAIN. A review of the messages produced by VICTIM 1 was conducted by your affiant, as well as other law enforcement officers, and the following was found:

12/15/2012 text message from (XXX) XXX-2597 to VICTIM 1:
“I fucking hate u. I thought if u could see i didnt want to use u, u'd trust me, and u fucking stabbed me STILL!!! ;(;(;(.”

12/15/12 text message from (XXX) XXX-2597 to VICTIM 1: “If Allah ever made a curse for ANYONE, WALLAH he made one for bitches like u!”

12/16/12 text message from (XXX) XXX-2597 to VICTIM 1:
“Lord cool my anger lest i strangle her within the next 15 hours...she is Urs to punish not mine. Oh Allah cool my anger for only strangling her, slapping her, killing her enter my mind. Ameen.”

12/16/12 text message from VICTIM 1 to (XXX) XXX-2597:
“Please leave me alone please”

12/16/12 text message from VICTIM 1 to (XXX) XXX-2597:
“Please enough”

12/16/12 text message from (XXX) XXX-2597 to VICTIM 1: “I have to put the phone down b4 i kill somebody. U say the kind of fucking things that would turn a SAINT into a homicidal maniac. Honestly the Dajjal could really use u, u'd be like his best weapon to ruin good ppl”

12/16/12 text message from (XXX) XXX-2597 to VICTIM 1: "if I ever do strangle u, rape u. kill u, slap u, burn u, for all u've done that would still not be 1% of what Allah has planned for u...."

12/16/12 text message from (XXX) XXX-2597 to VICTIM 1: "WHAT THE FUCK. im ONLY fucking ANGRY cuz u DIDNT go to me u STUPID RETARDED fucking bitch"

12/16/12 text message from (XXX) XXX-2597 to VICTIM 1: "Fuck jail im not feeling so bad about jail or getting shot up right now honestly"

12/19/12 text message from (XXX) XXX-2597 to VICTIM 1: "Why u not answering now? U want me to come thete kidap im a bag and rape u here or what?"

12/19/12 text message from VICTIM 1 to (XXX) XXX-2597: "You think raping is a joke definitely not to me"

12/19/12 text message from (XXX) XXX-2597 to VICTIM 1: "Lol who said raping was. A joke well-deserving bitch ? Now i stayed up a whole damn hour extra to tell u something. Plz let me"

12/19/12 text message from (XXX) XXX-2597 to VICTIM 1: "Plz respect that im trying to do things cordially (Victim 1). The last thing u want is me losing my patience at this stage of the game..."

12/19/12 text message from (XXX) XXX-2597 to VICTIM 1: "Looks like u don't fucking remember the order of ANYTHING u stupid bitch. Ya Allah, in closing with (Victim 1), forgive that the good in her has just now died, whether i strangle or rape her in the coming days in a final highly dangerous attempt to save her is questionable at best. I thank u my Lord for making me share with time on fb, phone, and library that were very sweet and i know for a fact that i hugged her then i would've saved her but i heatiated, the evil in her won bar none with it just now forcing a janazah to be read for that darling (Victim 1) i loved with all my heart ya Rabb *crying* oh how i wish she would've listened ya Rabb but to this day remains confused about *crying* everything. In tribute to the good in (Victim 1) that she killed *crying deeply without pause* tonight in a final irreversible blow. I just want to *gulp* say to her **crying bout* Oh *crying* (Victim 1) *tears*, it was a

joy to have met you *cries deeply* *cant speak* and u and i know that the heavens and earth longed that we might join with each other and my God *crying* did i put up a fight to that affect 9000 fb messages, some 200 phone calls, some 9000 texts, and our single meeting. Forgive me oh sweet, yet dead, part of (Victim 1), u know for certain our love would have been like another. Not just u dies now but pieces of my. *long crying session* heart die with u and where i put u in my heart, ur scar *crying deeply* will forever be right *crying deeper* here *rubbing chest and crying* *moment of silence* where had i been able to get u on this chest, i swear we would've made it my darling. From the horoscopes to lingirie to hugs wrists and waists to what u would call provocative, lol *cries* all now rests forever and *turns head and faces other towards the living (Victim 1) with a face of rage* May Allah and Ahlul Bayt, with every fiber of their being, by all that is holy and good in this universe to the very worst of this duniya and akhirah, and be cursed by Allah and all his angels forever, and may she through great sufferings unimaginable and spaced apart come to realize the graveness of what she did here, only to suffer even more afterwards. Forgive me Zahra (sa) and Zaynab (sa) that ur honorary daughter that lied within this girl has assuredly been killed and this girl duly damned by our Lord. Illahi-ameen. Inna lillahi wa inna alayhi rajeun.... :(;(;(;(;(~~~~~<\3
*waves**"

12/21/12 text message from (XXX) XXX-2597 to VICTIM 1: "If ur so astagfirullah then do whats right and marry me"

12/24/12 text message from VICTIM 1 to (XXX) XXX-2597: "Yes it is too much. When someone says NO and stop they mean just that. Im being very peaceful. I don't know what you want or what you have in mind and honestly I don't want to know or care. Again you threaten and harass me even more. This is the last you will hear from me. So just leave me alone. And don't contact me again".

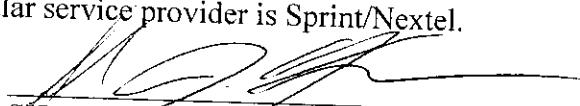
12/24/12 text message from (XXX) XXX-2597 to VICTIM 1: "No to both eh? Well...yes, of course it can trace back to me, my life may be destroyed, but all the stuff already in place, some of it's already beyond my control. I have some control on the leb's and paki's but stopping the puerto ricans and ex-BP's east and south of u is not as ez. Me? Yea, i already realize i'll probably be destroyed

already, though then it only escalates beyond my control and additional parties will get involved, one thing will lead to another, and u and i will suffer greatly, but i didnt want any of this. I was hoping this would never be the way and all i ask is u call me and let's settle this. one or two of my plans are already in action, but the others can perhaps be halted unless i hear from anyone other than u, such as ur family or police, then it is officially all out war. Plz reconsider. Im offering an ez way out and it only involves u having the decency to call me one last time to hopefully avert unnecessarily escalating tensions. A simple call. U don't prefer this to a war?"

12/24/12 text message from VICTIM 1 to (XXX) XXX-2597: "one more time and i will have the authorities involved. That last text says alot and is beyond harassment. DONT CALL. DONT TEXT. I will have my family call and

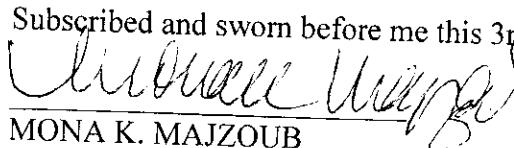
12/24/12 text message from (XXX) XXX-2597 to VICTIM 1: "make a report. Last warning."

15. Based upon information from employees of Sprint/Nextel, as well as my training and experience as a law enforcement officer, I know that Short Message Service (SMS), colloquially referred to as 'text messages,' are typed electronic communications between parties making use of telecommunication devices. When Sprint/Nextel is the mobile communications service provider, text messages are all handled through an SMS Service Center near Kansas City, Missouri. This means that all text messages over the Sprint/Nextel system will transit through this Kansas City, MO service center when sent from a sender and subsequently delivered to the receiver. According to VICTIM 1, her cellular service provider is Sprint/Nextel.



SHAUN J. KAHANEC
Special Agent, Federal Bureau of Investigation

Subscribed and sworn before me this 3rd day of May, 2013.



MONA K. MAJZOUB
United States Magistrate Judge